

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESALE PRICE
LITIGATION

)
) MDL NO. 1456
)

) CIVIL ACTION: 01-CV-12257-PBS
)

THIS DOCUMENT RELATES TO
ALL ACTIONS

) Judge Patti B. Saris
)

MOTION FOR ADMISSION *PRO HAC VICE* OF EDEN M. HEARD

Pursuant to Rule 83.5.3 of the Local Rules of the United States District Court for the District of Massachusetts (the “Local Rules”), Baxter Healthcare Corporation and Baxter International Inc. (“Baxter”) hereby move this Court to grant that Eden M. Heard, Esq., of Dickstein Shapiro Morin & Oshinsky LLP, 2101 L Street, N.W., Washington, DC 20037-1526, be admitted to appear on behalf of defendant Baxter and to practice before this Court in the above-entitled action. As grounds for this motion, the undersigned counsel respectfully represents the following:

1. Ms. Heard is and has been a member in good standing of the bar of the District of Columbia since January 8, 2001, the bar of the State of New York since May 18, 1999, and the bar of the State of New Jersey since December 21, 1998;

2. There are no disciplinary proceedings pending against Ms. Heard as a member of the bar in any jurisdiction;

3. Ms. Heard has represented to the undersigned counsel that she is familiar with the Local Rules of the United States District Court for the District of Massachusetts; and

4. In further support of this motion, Ms. Heard has submitted herewith as Exhibit A her Certificate of Good Standing as required by Local Rule 83.5.3.

WHEREFORE, the undersigned counsel respectfully moves Ms. Heard's admission to practice before this Court *pro hac vice*.

Respectfully submitted,

/s/ Jill Brenner Meixel
Peter E. Gelhaar, (BBO#: 188310)
Jill Brenner Meixel, (BBO#: 652501)
DONNELLY, CONROY & GELHAAR, LLP
One Beacon Street, 33rd Floor
Boston, MA 02108
(617) 720-2880

Dated: March 24, 2006

CERTIFICATE OF SERVICE

I, Eden M. Heard, certify that a true and correct copy of the foregoing Notice of Appearance was delivered to all counsel of record by electronic service pursuant to Paragraph 11 of the Case Management Order No. 2, by sending on March 24, 2006, a copy to Lexis/Nexis for posting and notification.

/s/ Eden M. Heard
Eden M. Heard